

### **REMARKS/ARGUMENTS**

This amendment is submitted along with a request for a three month extension and appropriate fee in reply to the Office Action dated October 17, 2007. Claims 50-72 currently stand rejected. Claims 1-49 were previously canceled. Applicant has canceled claims 50-72, without prejudice, and submits newly added claims 73-100, which have been added to further define patentable aspects of the invention. No new matter has been added by the amendment.

In light of the amendment and the remarks presented below, Applicant respectfully requests reconsideration and allowance of all now-pending claims of the present application.

#### **Claim Rejections - 35 USC §112**

Claims 50-63 stand rejected under 35 U.S.C. §112, second paragraph, as failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. As indicated above, claims 50-63 have been canceled, and thus the rejections are now moot. However, independent claims 73, 79, 83 and 87 generally correspond to prior independent claims 50, 59, 64 and 69, respectively, except that additional features are now recited and independent claims 73, 79, 83 and 87 more distinctly claim the subject matter which Applicant regards as the invention.

#### **Claim Rejections - 35 USC §102**

Claims 50-72 stand rejected under 35 U.S.C. §102(e) as being anticipated by Banerjee et al. (U.S. Patent No. 6,983,273, hereinafter "Banerjee"). As indicated above, claims 50-72 have been canceled, and thus the rejections are now moot. However, as also indicated above, independent claims 73, 79, 83 and 87 include at least some similar features that correspond to prior independent claims 50, 59, 64 and 69, respectively, along with additional features that further distinguish the claimed invention from the cited reference.

In this regard, independent claims 73, 79, 83 and 87 have been amended to recite, *inter alia*, identifying a measure of similarity between activities of a plurality of parties (claims 73 and 79) or profiling a group of information (claims 83 and 87), in both cases, without requiring a user to enter a keyword search or provide other advance knowledge of a subject of the information

groups. Thus, the claimed invention enables deriving a content profile for an information group (claims 73 and 79) or defining a list of related words (claims 83 and 87) without prior knowledge of the content of the information group. Independent claims 91 and 96 also describe the derivation of a content profile for an information group without prior knowledge of the subject of the information group. In other words, embodiments of the claimed invention do not require the user to provide any profile information descriptive of the content to be categorized. Banerjee fails to teach or suggest this feature.

Banerjee is directed to a system for linking sources of information that are associated with one or more predefined symbols or icons that indicate characteristics of the linked sites' content. As such, Banerjee, like other conventional mechanisms, describes locating websites using a process which requires an additional, external profile of content that is derived independently of both the method and the websites being compared. Thus, Banerjee requires knowledge of the content of at least one of the websites being sought. For example, as indicated in step 41 of FIG. 4, Banerjee requires an initial submission be provided to the search engine for indexing content. This submission comprises an external profile, which according to Banerjee and other conventional mechanisms, is typically defined manually and must be provided as an input in order for the system of Banerjee to perform its operation. As such, Banerjee uses an indirect comparison to identify similar websites, by comparing each website against one or more external profiles of content, and then assumes that those websites which match most closely the external content profile(s) must be similar in content.

More specifically, Banerjee describes two distinct methods in which external profile(s) of content are used conventionally to categorize and locate similar websites. In this regard, Banerjee describes the use of multiple keywords (analogous to a content profile), in a conventional keyword search as performed on a search engine (see col. 2, line 25). Banerjee also describes using predefined keyword lists to categorize websites into a hierarchical classification scheme. Entering the list of keywords may be used to return a list of websites whose content contains one or more of the keywords in the list, potentially ordered by the number of keywords that have been found. Banerjee also describes the categorization of websites into a hierarchical arrangement of categories (see col. 2, line 5), using predefined lists of keywords (col. 8, lines 10-

11). Thus, in all cases, Banerjee requires the provision of information with prior knowledge of the content of information groups (e.g., characteristics of websites based on the keywords entered or in the list).

When classifying websites, Banerjee provides that the content profile of the website being classified is then compared to each keyword list in the predefined keyword lists, to determine into which category(s) a website should be placed. The system of Banerjee will then consider any website placed in the same category to be similar. As such, the forms of classification described in Banerjee are indirect rather than direct, in that they require reference to an external reference data set (i.e., the keyword list(s)) in order to identify similar websites, considering those websites to which are similar to an external keyword list to be similar in content.

However, the claimed invention takes a direct approach to classification, without any requirement for reference to an external data set. In this regard, instead of a keyword descriptive of the subject, content profiles are derived for the information group of each party without prior knowledge of the content of the information group. In an exemplary embodiment, the user may merely enter a URL of a website instead of providing any advance knowledge of the content. Accordingly, according to an exemplary embodiment of the claimed invention, previously automatically pre-computed content profiles for every website may be provided in a database. A direct comparison may then be made between the content profiles. Thus, a direct comparison of websites may be made for clustering similar websites, without requiring any predefined content profile to compare against.

Accordingly, Banerjee fails to teach or suggest deriving a content profile for an information group (claims 73, 79, 91 and 96) or defining a list of related words (claims 83 and 87) without prior knowledge of the content of the information group as recited in the respective independent claims 73, 79, 83, 87, 91 and 96. Thus, independent claims 73, 79, 83, 87, 91 and 96 are patentable over Banerjee. Claims 74-78, 80-82, 84-86, 88-90, 92-95 and 97-100 each depend directly or indirectly from a respective one of independent claims 73, 79, 83, 87, 91 and 96 and therefore include all the recitations of their respective independent claims. Thus, dependent claims 74-78, 80-82, 84-86, 88-90, 92-95 and 97-100 are patentable for at least the

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same reasons given above for independent claims 73, 79, 83, 87, 91 and 96.

Accordingly, Applicant respectfully submits that new claims 73-100 are patentable.

**CONCLUSION**

In view of the amendments to the claims and the remarks presented above, Applicant respectfully submits that the present application is in condition for allowance. As such, the issuance of a Notice of Allowance is therefore respectfully requested. In order to expedite the examination of the present application, the Examiner is encouraged to contact Applicant's undersigned attorney in order to resolve any remaining issues.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



Chad L. Thorson  
Registration No. 55,675

**Customer No. 00826**  
**ALSTON & BIRD LLP**  
Bank of America Plaza  
101 South Tryon Street, Suite 4000  
Charlotte, NC 28280-4000  
Tel Charlotte Office (704) 444-1000  
Fax Charlotte Office (704) 444-1111

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